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10/26/1999



**Portland General Electric Company**  
121 SW Salmon Street • Portland, Oregon 97204  
503-464-8913 • facsimile 503-778-5566

**Fred D. Miller**  
Senior Vice President  
Public Policy and  
Administrative Services

October 26, 1999

Mr. Eric Blischke  
Coordinator, Portland Harbor Study Area  
Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland OR 97204

RE: VEH  
001

**SUBJECT: Voluntary Cleanup Program Intent to Participate  
PGE Harborton Substation Site**

Thank you for meeting with us on October 20, 1999 to discuss the Portland Harbor Voluntary Cleanup Program and its potential relationship with Portland General Electric's (PGE) Harborton Substation Site. As mentioned during the meeting, PGE does not believe that the information provided in your September 27, 1999 letter identifies a link between the operations at the Harborton Substation and the sediment contamination of the Willamette River. Moreover, the classification of the Harborton Substation as a "high priority" site for a remedial investigation appears to be based on incomplete and inaccurate information. In an effort to help clarify any misperceptions the Oregon Department of Environmental Quality (DEQ) may have regarding the facility's operating history or potential for releases to the Willamette River, PGE will submit to the DEQ an explanation and analysis of the issues raised in your letter of September 27.

Despite the misgivings identified above, PGE looks forward to the opportunity to work with the DEQ to determine jointly whether there is any relationship between the Harborton Substation site and the Willamette River sediment contamination. Accordingly, PGE hereby acknowledges its Intent to Participate in the Voluntary Cleanup Program.

We look forward to working with you on this matter and negotiating an appropriate remedial investigation plan that will evaluate the potential relationship between the Harborton site and the Willamette River sediment contamination. If you have any questions, please feel free to call Dennis Norton at (503) 464-8522.

*Fred D. Miller*  
Fred D. Miller  
Senior Vice President  
Public Policy & Administrative Services

Enclosure

USEPA SF



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c: Mike Rosen, DEQ  
Rod Struck, DEQ  
Kurt Burkholder, DOJ  
David Nutt, Enron  
Frank Smith, Enron  
Al Alexanderson, PGE  
Lolita Carter, PGE  
Ron Johnson, PGE  
Jim Lobdell, PGE  
Dennis Norton, PGE  
Robin Tompkins, PGE  
Bruce Trout, PGE

**VOLUNTARY CLEANUP PROGRAM  
INTENT TO PARTICIPATE**

**Identification of Site**

Site Name: Portland General Electric, Harborton Substation Site  
Site Address: 12430 & 12500 NW Marina Way, Portland, OR  
Owner/Operator: Portland General Electric Company  
Mailing Address: Attn: Dennis Norton, Portland General Electric Company, 121 SW  
Salmon Street, Portland, OR 97204

**Intent to Participate**

The undersigned intends to negotiate in good faith a written agreement with DEQ to provide for voluntary performance of a remedial investigation under DEQ oversight. The agreement will describe the project activities of each party and will require the undersigned to reimburse DEQ for oversight costs.

With this Intent to Participate, the undersigned does not admit or assume liability regarding the site.

Please execute this Intent to Participate in the space below and return it to:

Eric Blischke  
Department of Environmental Quality  
Waste Management and Cleanup Division  
811 S.W. Sixth Avenue  
Portland, OR 97204

By: Fred D. Miller  
(signature of authorized  
representative)

Name: Fred D. Miller  
(print or type)

Title: Senior Vice President

Company: Portland General Electric

Date: October 26, 1999

Telephone: (503) 464-8913